

DAVID SEROR - Bar No. 67488
JESSICA L. BAGDANOV - Bar No. 281020
BG LAW LLP
21650 Oxnard Street, Suite 500
Woodland Hills, CA 91367
Telephone: (818) 827-9000
Facsimile: (818) 827-9099
Email: dseror@bg.law
jbagdanov@bg.law

Attorneys for Sam Leslie,
Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
COLDWATER DEVELOPMENT, LLC,
A California limited liability company,

Debtor.

Case No. 2:21-bk-10335-BB
Chapter 11
Jointly Administered with
Case No. 2:21-bk-10336-BB

In re
LYDDA LUD, LLC, a California limited
liability company,

Debtor.

**DECLARATION OF JESSICA L.
BAGDANOV RE COMPLIANCE WITH
ORDER SHORTENING TIME**

Hearing Set:

Date: February 9, 2022
Time: 10:00 a.m.
Place: Courtroom 1539
255 East Temple Street
Los Angeles, CA 90012

- ☒ Affects both Debtors.
☐ Affects Coldwater Development LLC only.
☐ Affects Lydda Lud, LLC only.

Debtors.

DECLARATION OF JESSICA L. BAGDANOV

I, Jessica L. Bagdanov, declare:

1. I am an attorney duly licensed to practice law before all courts of the State of
California and this Court. I am a partner at BG Law LLP, counsel of record for Sam Leslie, the

chapter 11 trustee for these estates. Unless otherwise noted, the facts contained in this declaration are based on my personal knowledge and if called as a witness, I could and would competently testify thereto under oath.

2. I make this Declaration in accordance with the Court's *Order Granting Application and Setting Hearing on Shortened Notice* ("OST") (Docket No. 229) entered with regard to the *Chapter 11 Trustee's Motion for Order: Approving Retention of ThreeSixty Asset Advisors, LLC and WFS Inc. dba Tranzon Asset Strategies as Auctioneers Pursuant to 11 U.S.C. § 327 and Approving Auctioneer's Proposed Costs* (the "Motion," Docket No. 226).

3. Upon entry and my review of the OST, my office and I took the following actions to provide telephonic and written notice of the hearing on the Motion:

4. Compliance with ¶ 3(b)(2) of OST.

- *Debtor's Counsel:* On February 3, 2022 at 4:20 p.m. PST, I called Annie Stoops at Arent Fox LLP, counsel for the Debtors, and advised Ms. Stoops of the OST, that a hearing on the Motion will be taking place on February 9, 2022 at 10:00 a.m., that any opposition the Motion must be filed and served so that it is received by my office no later than February 7, 2022 at 5:00 p.m., and that written notice of the hearing and a copy of the OST would be forthcoming.

- *United States Trustee:* On February 3, 2022 at 4:25 p.m. PST I called and left a voicemail for Eryk Escobar, advising him of the OST, that a hearing on the Motion will be taking place on February 9, 2022 at 10:00 a.m., that any opposition the Motion must be filed and served so that it is received by my office no later than February 7, 2022 at 5:00 p.m., and that written notice of the hearing and a copy of the OST would be forthcoming.

5. Compliance with ¶ 3(b)(3) and (4) of OST. On February 3, 2022, my office caused the following documents to be served via overnight mail and/or NEF email service:

- The Motion and all supporting evidence (Docket No. 226); and
- The Notice of Hearing, which included a copy of the OST (Docket No. 231).

6. A proof of service reflecting such service efforts is attached hereto as **Exhibit A.**

7. With respect to certain government agencies, the preferred mailing address in bankruptcy cases is a P.O. Box, which cannot receive overnight mail. Thus, my office sent the

1 above-listed documents to those agencies via U.S. Mail in lieu of overnight mail to ensure the
2 documents are received. *See* Exhibit A.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed this 4th day of February, 2022, at Woodland Hills, California.

6
7
8 
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jessica L. Bagdanov

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367.

A true and correct copy of the foregoing document entitled:

1. **CHAPTER 11 TRUSTEE'S MOTION FOR ORDER: APPROVING RETENTION OF THREESIXTY ASSET ADVISORS, LLC AND WFS INC. DBA TRANZON ASSET STRATEGIES AS AUCTIONEERS PURSUANT TO 11 U.S.C. § 327 AND APPROVING AUCTIONEER'S PROPOSED COSTS; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATIONS OF SAM S. LESLIE, JEFFREY J. TANENBAUM, AND MICHAEL C. WALTERS IN SUPPORT THEREOF; AND**
2. **NOTICE OF HEARING ON: CHAPTER 11 TRUSTEE'S MOTION FOR ORDER: APPROVING RETENTION OF THREESIXTY ASSET ADVISORS, LLC AND WFS INC. DBA TRANZON ASSET STRATEGIES AS AUCTIONEERS PURSUANT TO 11 U.S.C. § 327 AND APPROVING AUCTIONEER'S PROPOSED COSTS** will be served or was served (a) on the judge

in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On **February 3, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 3, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 3, 2022
Date

Mela Galvan
Printed Name

/s/ Mela Galvan
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

2. SERVED BY UNITED STATES MAIL:

Employment Development Dept. Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280-0001	Franchise Tax Board Bankruptcy Section MS: A-340 P.O. Box 2952 Sacramento, CA 95812-2952	Internal Revenue Service PO Box 7346 Philadelphia, PA 19101-7346
Internal Revenue Service Centralized Insolvency Operations PO Box 7346 Philadelphia PA 19101-7346	Los Angeles County Treasurer and Tax Colle Attn Bankruptcy Unit Po Box 54110 Los Angeles CA 90054-0110	Los Angeles Department of Water and Power P.O. Box 51111 Los Angeles, CA 90051-5700

3. SERVED BY OVERNIGHT MAIL:

Bel Air Project LLC 9454 Wilshire Blvd. #320 Beverly Hills, CA 90212	Construction Enterprise & Services 11301 W. Olympic Blvd. #537 Los Angeles, CA 90064	First Credit Bank, a California banking corporation 9255 Sunset Blvd. West Hollywood, CA 90069
Office of Finance, City of Los Angeles 200 N. Spring St., Rm 101 City Hall Los Angeles, CA 90012	Securities & Exchange Commission 444 South Flower St., Suite 900 Los Angeles, CA 90071-2934	IRS ATTN Insolvency 24000 Avila Road, Mail Stop 5503 Laguna Niguel, CA 92677-3405
Land Phases Inc. 5158 Cochran St. Simi Valley, CA 93063	Larry A. Rothstein 2945 Townsgate Rd., Suite 200 Westlake Village, CA 91361	Law Offices of Adulaziz, Grossbart and Rudman 6454 Coldwater Canyon Ave. North Hollywood, CA 91606
LC Engineering Group, Inc. 889 Pierce Court, Suite 101 Thousand Oaks, CA 91360	Lincoln Resorts an AZ Joint Venture c/o Freeman Freeman & Smiley LLP 1888 Century Park East St 1500 Los Angeles, CA 90067	RAL Design and Management Inc. Russell Linch 25031 W. Avenue Stanford Unit 100 Valencia, CA 91355
Lydda Lud, LLC 11301 W. Olympic Blvd. #537 Los Angeles, CA 90064	Permits Unlimited 4340 Caleta Rd. Agoura Hills, CA 91301	Shahbaz Law Group 15760 Ventura Blvd., Ste. 850 Encino, CA 91436
State of California Department of Industrial Relations 6150 Van Nuys Blvd # 105 Van Nuys, CA 91401	Tree Lane LLC 11301 W. Olympic Blvd. #537 Los Angeles, CA 90064	Treetop Development LLC 11301 W. Olympic Blvd. #537 Los Angeles, CA 90064
United States Trustee (LA) 915 Wilshire Blvd, Suite 1850 Los Angeles, CA 90017-3560	Lennie Liston, Esq. PE, QSD/QSP - President LC ENGINEERING GROUP, INC. 889 Pierce Ct., Ste. 101 Thousand Oaks, CA 91360	

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367.

A true and correct copy of the foregoing document entitled: **DECLARATION OF JESSICA L. BAGDANOV RE COMPLIANCE WITH ORDER SHORTENING TIME** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 4, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Eryk R Escobar eryl.r.escobar@usdoj.gov
- M Douglas Flahaut flahaut.douglas@arentfox.com
- Eric J Fromme efromme@tocounsel.com, stena@tocounsel.com
- Asa S Hami ahami@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;
cblair@sulmeyerlaw.com;ahami@ecf.inforuptcy.com
- Christopher J Harney charney@tocounsel.com, stena@tocounsel.com
- Sam S Leslie (TR) sleslie@trusteeleslie.com, trustee@trusteeleslie.com;C195@ecfcbis.com
- Daniel A Lev dlev@sulmeyerlaw.com, ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com
- William N Lobel wlobel@tocounsel.com, jokeefe@tocounsel.com;sschuster@tocounsel.com
- Aram Ordubegian ordubegian.aram@arentfox.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com
- David Seror dseror@bg.law, ecf@bg.law
- Annie Y Stoops annie.stoops@arentfox.com, yvonne.li@arentfox.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Dylan J Yamamoto dylan.yamamoto@arentfox.com
- Robert M Yaspan court@yaspanlaw.com, tmenachian@yaspanlaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

****JUDGE'S COPY UNDER 25 PAGES IS SUSPENDED (GENERAL ORDER 21-05).**

Honorable Sheri Bluebond
United States Bankruptcy Court
255 East Temple Street, Suite 1534
Los Angeles, CA 90012-3332

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 4, 2022
Date

Mela Galvan
Printed Name

/s/ Mela Galvan
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.